



Department of Energy  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

0053584

00-OSS-476

AUG 14 2000

RECEIVED  
AUG 24 2000

EDMC

Mr. E. R. Skinnarland, Section Manager  
Waste Management  
State of Washington  
Department of Ecology  
1315 West 4<sup>th</sup> Avenue  
Kennewick, Washington 99336

Dear Mr. Skinnarland:

RESPONSE TO JUNE 12, 2000, STATE OF WASHINGTON DEPARTMENT OF ECOLOGY (ECOLOGY), NOTICE OF CORRECTION, DOCKET NUMBER 00NWPKW-1204

- References:
- (1) Ecology ltr. to S. H. Wisness, RL, and J. D. Williams, FHI, from Kathy Conaway, "Approval of Extension to Certain Corrective Measures Resulting from August 8, 1999, Dangerous Waste Compliance Inspection of the Waste Encapsulation Storage Facility (WESF), 200 East Area of Hanford - Docket Number 00NWPKW-1204," dtd. July 13, 2000.
  - (2) RL ltr. to E. R. Skinnarland, Ecology, from S. H. Wisness, RL, and J. D. Williams, FHI, 00-OSS-414, "Request for an extension to Complete Certain Corrective Measures Contained in the June 12, 2000, State of Washington Department of Ecology Notice of Correction (NOC), Docket Number 00NWPKW-1204," dtd. July 3, 2000. 53395
  - (3) Ecology ltr. to K. A. Klein, RL, and D. B. VanLeuven, FHI, from Kathy Conaway, "Notice of Correction from August 8, 1999, Dangerous Waste Compliance Inspection of the Waste Encapsulation Storage Facility (WESF), 200 East Area of Hanford - Docket Number 00NWPKW-1204," dtd. June 12, 2000. 53165

With this letter, the U.S. Department of Energy, Richland Operations Office (RL), is documenting completion of Corrective Measure #4 of Reference 3 within the granted schedule extension as approved in Reference 1. Corrective Measure #4 stated: "Within thirty (30) days of receipt of this letter, USDOE and FH will describe in writing the labeling and identification system currently in use at WESF. In addition, USDOE and FH will post placards, which adequately identify the major risk(s) associated with the contents of the capsules. Placement of the placards shall be at all points of entry into the 225 B building and the TSD boundary." The enclosure provides documentation of completion of the above corrective measure.

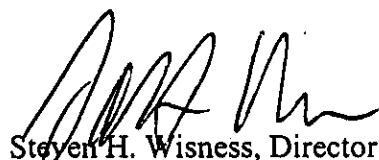
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With regards to the storage of the cesium/strontium capsules under interim status, RL believes the actions carried out and the description provided for Corrective Measure #4 are the best management practices available when comparing the Atomic Energy Act requirements with the State of Washington Hazardous Waste Management Act requirements. RL believes that the current labeling and identification system, combined with the major risk placards, in use at the Waste Encapsulation Storage Facility provides equivalent protection of human health and the environment and complies with the intent of Washington Administrative Code (WAC) 173-303-630(3) which is invoked as a state-only interim status requirement for containers by WAC 173-303-400(3)(a)(ii).

Finally, RL shares with the State of Washington Department of Ecology (Ecology) a continued interest in achieving resolution to storage issues, and will be continuing on-going conversations with Ecology regarding these important issues. Should you have any questions, please contact Ellen Mattlin, Office of Site Services, on (509) 376-2385; Greg Sinton, Waste Management Division, on (509) 373-7939; or Cindy Girres, Fluor Hanford Inc., on (509) 373-3511.



Steven H. Wisness, Director  
Office of Site Services  
DOE Richland Operations Office



Janice D. Williams, Senior Director  
Responsible Party for Fluor Hanford, Inc.

Enclosure

cc w/encl:

Administrative Record - H6-08

W. Burke, CTUIR

K. A. Conaway, Ecology

J. J. Wallace, Ecology

R. W. Wilson, Ecology

C. K. Girres, FHI

J. G. Granger, FHI

B. Oldfield, FHI

F. M. Simmons, FHI

J. D. Williams, FHI

Environmental Portal, LMSI

P. Sobotta, NPT

R. Jim, YN

Enclosure

5 pages including cover

Written description of labeling and identification system for the Cs/Sr capsules.

There are currently a total of 1936 capsules in storage at WESF. The capsules stored at WESF are as follows:

- 1335 cesium capsules, of which 23 are overpacked
- 601 strontium capsules.

Each capsule is labeled with a unique identifying number. Cesium capsules are labeled with a C followed by an identifying number of four digits or less. Strontium capsules are labeled with an S followed by an identifying number of four digits or less. (Note: The C and S designator appear only on the hot weld end of the capsule. This end was welded in the hot cell and is referred to as the hot weld. The other end was welded in the fabrication shops.)

The 23 overpacked cesium capsules are labeled as follows:

- 16 overpacked cesium capsules are labeled with a W followed by the assembly number (four digits or less)
- 7 cesium remnants that are either powder or pellets are labeled WPP1 through WPP5, WPP 7 and WPP 8. The numbers are etched on both end caps.

Placard major risk(s) and placement.

Placards have been posted at the 225-B building to identify the major risk from the dangerous waste component associated with the Cs/Sr capsules. Placards have been posted on or adjacent to doors at the following entry locations to the 225-B building.

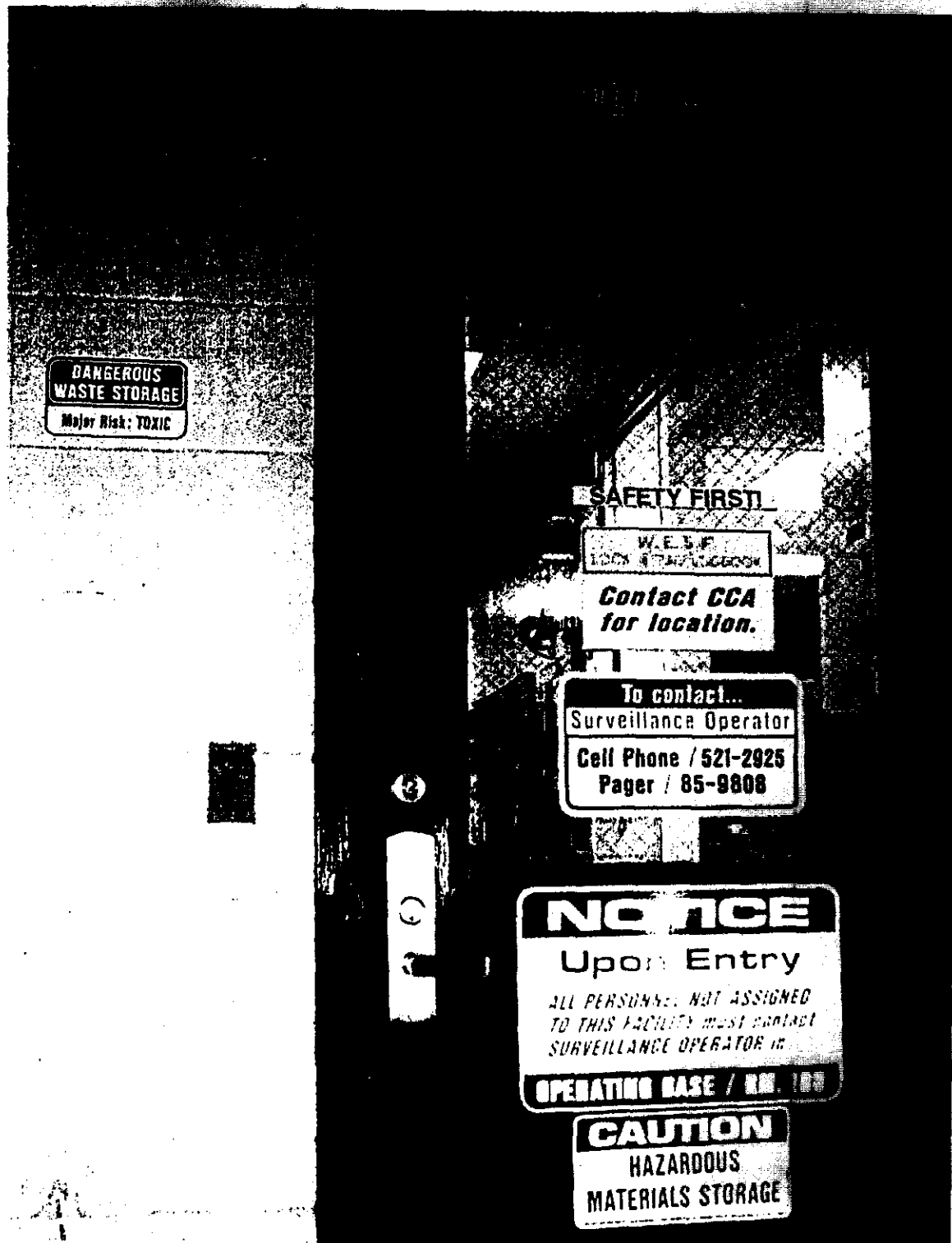
- 104 – SWP Room entry (East entry, both doors)
- 106 – Main entry to 225-B
- 113 – HVAC Room entry
- Roll-up door to HVAC room
- 124 – Truck port entry (placed between entry door and roll up door)

Placards have been posted on or adjacent to doors at the TSD boundary at the following entry locations:

- 114 – Airlock entry into the pool cell area from the operating gallery
- 118 – Airlock entry into A cell
- G-Cell entry door
- 123 – Truck port entry into the pool cell area.

The placards are legible from a distance of 25 feet. The placards have a predominantly red upper panel with black outlined borders that reads "DANGEROUS WASTE STORAGE" and a white lower panel that reads "Major Risk: TOXIC." Photographs of the placards are enclosed. Additionally the entry locations are shown on the enclosed figure.

Placard placed at main entry into 225-B (WESF).



Placard placed at entrance into Pool Cell Area.



**AIRLOCK DOOR**

*OPEN ONLY WHEN  
RED LIGHT IS OFF!*

